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9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA
11 FRESNO DIVISION
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14 CHESSY S. DONNELLY,

15 Plaintiff,

16 v.

17 KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

18 Defendant.
19
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No. 1:21-cv-01117-BAM

STIPULATION FOR AN EXTENSION OF TIME;
[PROPOSED] ORDER

21 Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties,
22 through their respective counsel of record, that the time for Defendant to respond to Plaintiff's
23 Motion for Summary Judgment be extended forty-five (45) days from April 25, 2022, up to and
24 including June 9, 2022. This is the parties' first stipulation for an extension of the Court's
25 Scheduling Order.

26 Defendant requests this extension because this case was recently reassigned to the
27 undersigned attorney who currently has eight district court briefs due in the next six weeks, and
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four of those briefs are due between April 21, 2022, and April 25, 2022, the current due date for Defendant's response to Plaintiff's Motion for Summary Judgment in this case.

Due to the overall volume of work within the Commissioner's Region IX Office of General Counsel, neither the undersigned attorney nor another attorney in the Region IX Office anticipate being able to review and respond to Plaintiff's Motion for Summary Judgment by the current due date. Current staffing limitations caused by planned and unplanned leave of multiple attorneys make immediate reassignment impractical. Accordingly, the Commissioner respectfully requests an extension of 45 days, until June 9, 2022, to respond to Plaintiff's Motion for Summary Judgment.

This request is made in good faith and is not intended to delay the proceedings in this matter.

Respectfully submitted,

DATE: March 16, 2022

/s/ Shellie Lott
SHELLIE LOTT
Attorney for Plaintiff
(as approved via email)

DATE: March 16, 2022

PHILLIP A. TALBERT
United States Attorney

By: /s/ Elizabeth Landgraf
ELIZABETH LANDGRAF
Special Assistant United States Attorney
Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation, and good cause appearing, Defendant shall have an extension, up to and including June 9, 2022, to respond to Plaintiff's Motion for Summary Judgment.
IT IS SO ORDERED.

Dated: March 17, 2022

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE